

Comments on Petition RM-10807

Concerning Amendment of Part 97 Rules
to Eliminate Element 1 (5 Words-Per-Minute
Radiotelegraph Examination) testing on a
limited basis

The petitioners have assembled and filed a thoughtful, well thought out describing the current state of amateur radio licensing today, and the role of the radiotelegraph code in the licensing program.

I do not agree with them, though, that the morse element should be merged in with the written element, or that the volunteer examiners at a testing session should be required to validate the number of characters copied consecutively. Some examinee's handwriting can be difficult to decipher, and I think that the present method of having the examinee answer a multiple choice exam concerning the content of the message sent is the best and most efficient format for evaluating an examinee's ability to receive the material sent. I think that the radiotelegraph element should be retained and administered as a separate element, as it is today.

I agree whole-heartedly with the petitioner's research and concern expressed at the technical rigour of the written elements administered today in comparison with that required of examinees prior to license restructuring. Additionally, I feel that the practice of publishing the question pool with the correct answers makes passage of the written element something of a farce. In the past, the FCC provided an outline of the topics covered on the exam elements, and examinees studied sample questions followed by detailed dicussion of the material; any of the ARRL License Manuals at least from the late 70's and earlier demonstrate this. I think that the Amateur Radio Service was better served by this approach.

Respectfully Submitted,

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